

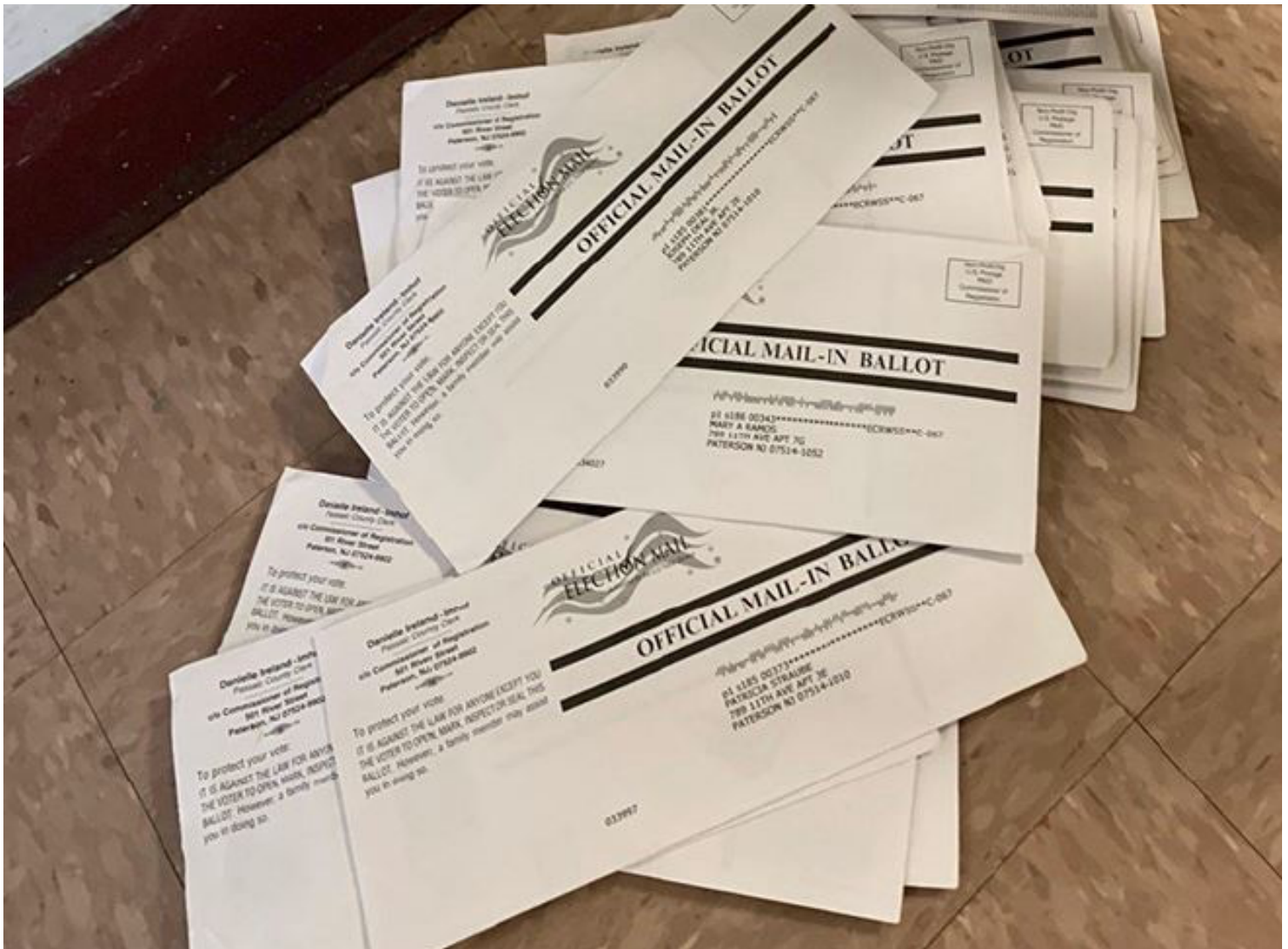
# Exhibit 15

September 15, 2020



<a href="#">Home</a>	<a href="#">Governor</a>	<a href="#">Legislature</a>	<a href="#">Local</a> ▾	<a href="#">National</a>	<a href="#">Congress</a>	<a href="#">Media</a>	<a href="#">Power List</a>
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Home > Campaigns > Evidence Of Massive Voter Fraud In Paterson Election, Court Records Show



Ballots left on the floor of an apartment building at 789 11th Avenue in Paterson, New Jersey, allegedly by Service. Photo courtesy of documents filed with the New Jersey Superior Court.

# Evidence of massive voter fraud in Paterson election court records show

*Salmon: 'is impossible to tell with any reasonable certainty who actually won election'*

By David Wildstein, June 14 2020 3:46 pm

Claiming systemic voter disenfranchisement, Bill McKoy has filed a legal challenge to the May 12 election in Paterson's 3rd Ward and wants a judge to order a new election.

McKoy, the incumbent, trails Alex Mendez by 240 votes after a recount in an election that has been tainted by evidence of widespread ballot tampering that has triggered investigations by state and federal law enforcement.

"In just a few weeks with limited resources, we have uncovered a deep and systemic problem with the way the election was conducted, at seemingly every level," said Scott Salmon, a lawyer for the McKoy campaign. "We are not sure who won with what appears to be a concerted effort to steal this election through a massive voter fraud program.

Nearly 900 votes that appear to have been mailed in bulk from three individual mailboxes, including more than 100 rubber-banded together from a mailbox in neighboring Haledon, have not yet been counted.

"As an elections lawyer, I can say with some expertise that voter fraud is extraordinarily rare, and it is precisely so rare that what happened in Paterson stands out like a sore thumb," Salmon said. "Ultimately, we believe it is impossible to tell with any reasonable certainty who actually won this election, and so we call on all other voters to join us in demanding a new election, one that is fair, free, and results in a true expression of the will of the people."

McKoy says that 25% of voters in his ward were disenfranchised, something he calls "unacceptable."

"Every Paterson voter's voice should and must be heard in order to ensure a fair and open election process," McKoy said. "Many have given their life for our right to vote, so we must honor their sacrifices as we exercise our constitutional right to elect our representatives."

A brief filed by Salmon says the election "was rife with nonfeasance, malfeasance, and straight up voter fraud. It was a failure at every level, from the mailing of VBMs to their delivery, from the actual casting of the ballots to the counting of the same by the Board of Elections and their counting."

"The number of legal votes rejected and illegal votes accepted exceeds the number of votes separating the candidates and thus are sufficient to change the result of the election," the filing states.

According to the court filing, YaYa Luis Mendez, a campaign worker for Alex Mendez, "confessed to investigating on behalf of the (New Jersey Attorney General's) office to having stolen ballots out of mailboxes, both completed and uncompleted, on behalf of and at the direction of the Mendez campaign."

Mendez has been questioned by investigators about allegations that the Mendez campaign stole ballots, Mendez alleges.

"This is how the Mendez campaign attempted to steal the Election, by stealing completed ballots over the phone to build up a database of signatures," the filing claims. "The Mendez campaign obtains copies of voter registration application forms to obtain signatures, as well as by making copies of candidate petitions with voter signatures through his multiple runs for office since 2012."

McKoy's team says that once a signature database has been assembled, "individuals like Ms. Mendez, steal the ballots, fill them out for the candidate of their choice (such as Mendez and those he supports), and mail them to the Board of Elections."

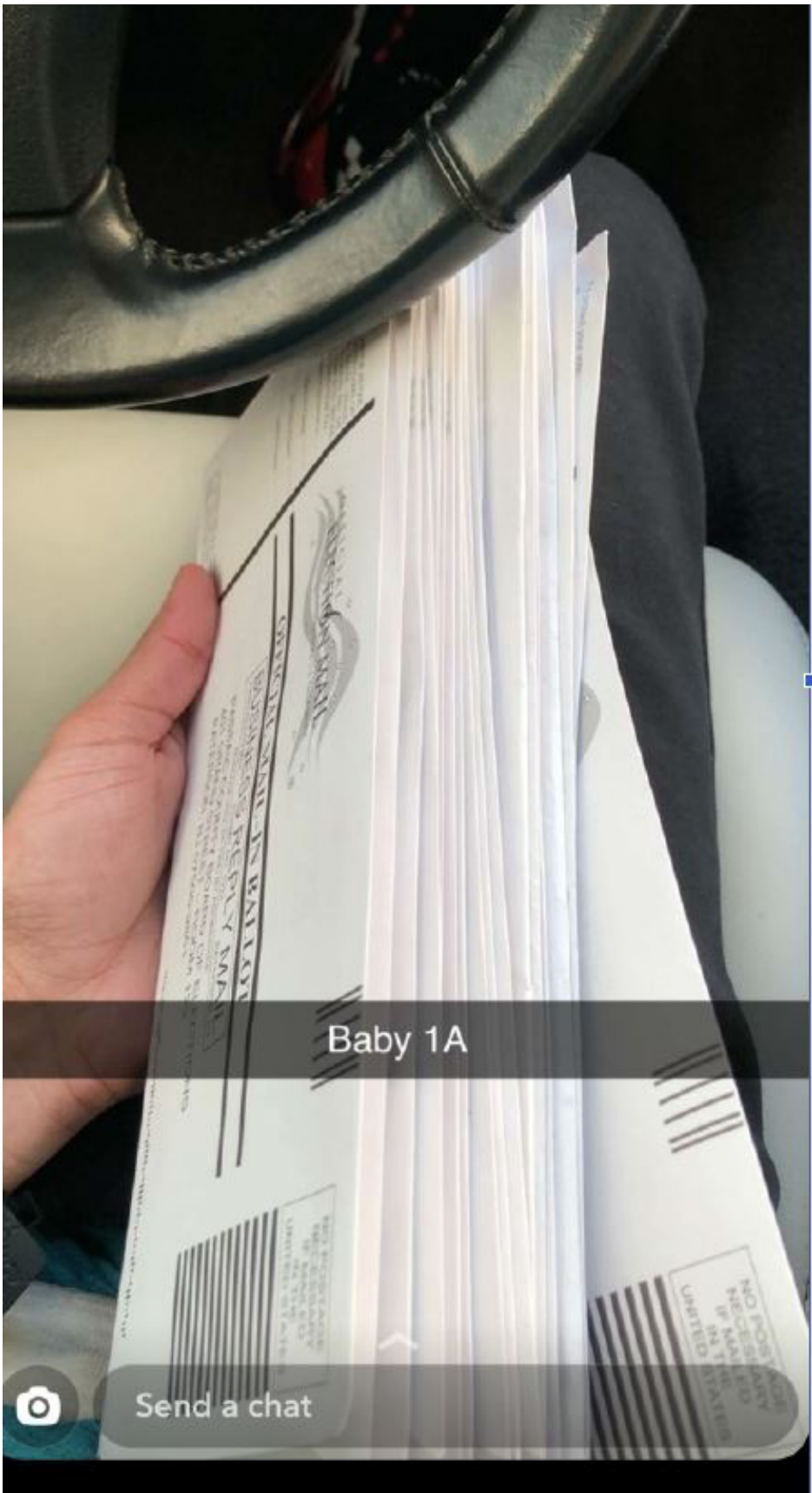
"It is impossible to know just how many ballots were stolen in this Election," McKoy claims. "Simply because some were caught does not mean that all were caught. Yet, given the number that were, in fact, rejected, far in excess of the margin in the Election, it seems likely that there were many more of which we will never know for sure."

It's not immediately clear if YaYa Luis Mendez and Alex Mendez are related.

In an astonishing example of possible voter fraud, McKoy's team cites an instructional video prepared by a prominent member of Mendez's campaign team, that shows Joaquin filling out a vote-by-mail ballot on behalf of a voter, Miquel Joaquin-Morillo.

Joaquin is shown in the video showing how to vote for Ramon Joaquin in the 5th Ward, "but he is clearly holding a 1st Ward ballot with a vote for Mossieh Uddin, who had the same ballot position of 2A in the 1st Ward that Ramon Joaquin had in the 5th Ward."

"Joaquin clearly completes the ballot as well as seals the envelope without completing the assessor or bearer portion of the ballot," the court filing alleges. "Finally, Joaquin visibly seals the inner-envelope inside the outer envelope on-camera. Joaquin does not demonstrate filling out the bearer portion of the ballot."



Snapchat video allegedly from Abu Ryazen shows stacks of vote-

Documents filed with the court alleged Ryazen posted a video and photograph of a ballot on social media.

Ryazen indicates on the Snapchat video that the ballots in his possession are for Cour Khalique, who has a 1-vote lead in his election in the 2nd Ward.

"It is unclear whether all such ballots were for Khalique. It is unclear whether Ryazen collected the ballots and was unlawfully the bearer of same or whether anyone else did so and fraudulently completed them," the court states. "In either case, there is substantial evidence that there are an unknown number of otherwise illegal ballots cast in the election."

McKoy's legal filing claims that the Board of Elections "was notified of the video and photograph of the ballots being opened on Election Day but they either failed or were unable to identify the specific ballots and they were therefore not removed from the count."

"Given the number and variety of the discrepancies and issues, far in excess of what is considered typical for Paterson, much less for New Jersey, we will never know for sure who won the Election," McKoy's lawyers state.

### Post Office Delivery of VBM ballots

The New Jersey Globe has reported that the United States Postal Service left vote-by-mail ballot boxes in areas of apartment buildings, rather than in private mail boxes.

by-mail ballots in the May 12 all-VBM Paterson city council election.

McKoy's legal team cited several examples of potential fraud, naming specific voters who never received their ballot.

In some instances, those ballots were returned to the Board of Elections with signatures that did not match the voter's name.

"One notable case is Eduardo R. Soriano, Jr., who stated that he never received a ballot and therefore never received one. Somehow, upon information and belief, a ballot bearing his name was received by the Board of Elections, but it was rejected due to a mismatched signature," the legal documents allege. "

McKoy's team says it's possible that ballots could have been stolen and forged.

"Simply because someone was caught attempting to forge Mr. Soriano's ballot does not mean that all such ballots were caught, the court filing states.

The court filing also notes that 101 ballots from the 3rd Ward voters were delivered late "were delivered late due to the fault of their own, but rather that of the USPS, and should therefore be counted."

Documents also allege several issues with bearer ballots, including one from the wife of Passaic County Fire Commissioner Best.

"Freeholder Best brought the ballots inside while his wife waited in the car, signed the bearer book on behalf of the voters, and then presented their ballots upon the request of the Board of Elections employee present, and specifically asked if there was anything else he needed to do," McKoy's team alleges. "Freeholder Best was informed that he had done everything and that the ballots were complete. Ms. Best's ballot was later rejected because the bearer portion of her ballot was incomplete, as Freeholder Best signed it. As a result, even though Freeholder Best was told that the ballots were complete, Ms. Best's ballot was unlawfully rejected due to the Board of Elections' own failure in following the law."

The filing also documents 301 mismatched signatures in the 3rd Ward – more than the last three Paterson city council elections combined.

In addition, 35 ballots were rejected even though voters filled them out in their own homes, the filing alleges.

Among the bulk rejected ballots by the Board of Elections were those cast by Assembly Deputy Speaker Brian P. Kopp and his family.

"Wimberly dropped off his ballot, as well as that of his family members, at the post office on Ward Street in the 3rd Ward."



court documents show. "Yet the Wimberly family ballots were found among the 878 VBMs discovered before which ballots were rejected by the Board of Elections."

McKoy's legal team claims that "at a minimum, the 552 VBMs discarded as part of the Bulk Reject Ballots, margin of victory in the Election, demonstrate that this was not a free and fair election."

"Even if all of these ballots were considered individually, we have no way of knowing which ballots, like the Assemblyman Wimberley, were legitimate, and which ballots were stolen from voters before they could cast the filing said.

"Critically, for each voter whose ballot was unlawfully taken from them and "completed" on their behalf, it two-vote swing: one vote cast improperly for Mendez and another vote that should have gone to McKoy. / Election Day has passed, the Court cannot recreate it," McKoy's legal team states.

Passaic County Board of Elections Chairman John Currie, who also chairs the state and county Democratic election day that the Federal Bureau of Investigation was on-site investigating the Paterson balloting. Currie live-stream broadcast of the count and made his comments to other election officials.

Mendez, who ran for mayor in 2018, is a former at-large councilman and political rival of Mayor Andre Say. Conventional wisdom is that Mendez challenged McKoy to set up another run for mayor in 2022.

Last week, Mendez claimed city officials used police officers to "intimidate and abuse Hispanic voters" to help McKoy keep his council seat.

"It would appear at this time that there is a systematic plan underway to disenfranchise a significant portion of the electorate, in order to benefit the incumbent candidate, who lost the election by 240 votes, even with the disqualified," said Gregg F. Paster, McKoy's attorney. "If we are going to start going door to door questioning every ballot, as was the intent of the Governor in ordering universal mail in voting for this election, we will count all 4,500 votes individually and see what the result is."

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